

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:)
)
Creation of a Low Power Radio Service) MM Docket-99-25
)
)

REC NETWORKS
REPLY COMMENTS

1. REC Networks (“REC”), an unincorporated entity through its founder Michelle (Michi) Eyre is a long-time proponent for the Low Power FM (LPFM) radio service from the original petitions for the service through today and into the future. REC is best known for our free self-service broadcast tools including the Low Power FM Search Tool as well as providing education regarding the Low Power FM Radio Service as well as other broadcast services¹. REC believes in a citizen’s access to the airwaves.

**A. THERE IS OVERWHELMING SUPPORT FOR THE COMMISSION TO
RETAIN A “SUB-100” WATT SERVICE SUCH AS REC’S PROPOSED 50-
WATT ENHANCEMENT TO LP10**

2. From throughout the LPFM community, there have been many calls to retain the LP10 service² and as Common Frequency noted, it may be the only service available to major

¹ - <http://www.recnet.com/lpfm> - <http://lpfm.ws> – <http://lpfm2012.com>

² - See comments of Jeff Sibert (“Sibert”) at 2, National Lawyers Guild (“NLG”) at 6, Intercollegiate Broadcast System (“IBS”) at 1, Joint Center for Political and Economic Studies (“JCPES”) at 4 and Grant County Broadcasters (“WNKR”) at 2.

metropolitan areas such as New York City³. Nexus Broadcast has recognized that LP10 has never been given a fair chance to prove its viability⁴.

3. *10-watts may be too little to be efficient.* As echoed in different ways by du Triel, Lundin & Rackley (“dLR”) as well as the New Jersey Broadcasters Association (“NJBA”), there were concerns about the interference received by LP10 stations from other facilities⁵ and NJBA’s theory that a 10-watt LPFM station could carve out an interference area of over 2,000% when compared to a Class B station⁶. However, if we use the NJBA’s science, we would find that a Class A FM station operating at full facilities would still have a 1,582% interference to service ratio in respect to Class B. In comparison, a Class A station only has a 982% interference to service ratio with other Class A stations operating at full facilities. In respect to Class A FM stations, LP100 and LP10 have 1,098% and 1,022% respectively⁷, which overall is not as much of a spread as the Class B figures are. Perhaps the problem here is not with LPFM stations or even Class A stations. Perhaps the problem is with Class B stations and instead of eliminating LP10 stations, NJBA just made an argument for the elimination of Class B stations. But seriously, we are more inclined by dLR’s argument that LP10 would be prone to interference from other facilities thus limiting their ability in certain parts of their service areas. We do not

³ - See Common Frequency (“CF”) comments at 13.

⁴ - See Nexus Broadcast (“Nexus”) comments at 2.

⁵ - See dLR comments at 4.

⁶ - See NJBA comments at para 2.

⁷ - See *Interference Effect on Low Power Stations*, appendix to NJBA comments at 1 and 2.

feel that LP10 is the best “sub-100” solution⁸ but there are better options that have been presented in this proceeding.

4. *LP50 is a better answer.* In *Comments*, REC proposed to “maximize” the LP10 service by increasing the maximum facility to 50 watts at 30 kilometers HAAT (4.7 km service contour). The maximized “LP50” service proposed by REC has received support from most major proponents in the LPFM community including Prometheus Radio Project (“Prometheus”), The Amherst Alliance, Common Frequency, National Lawyers Guild, Nexus Broadcast and Common Frequency⁹. Prometheus echoes our statements that a maximized “LP50” service would improve indoor listening when compared to an LP10 station at the same distance thus making LP50 a viable option for urban community radio where LP100 opportunities do not exist¹⁰. Prometheus further states that LP50 would represent a compromise between the technical superiority of LP100 and the greater availability of LP10 while meeting the Local Community Radio Act of 2010 (“LCRA”) mandate to create licensing opportunities without jeopardizing the equally important goal of technically viable stations that meet local community need¹¹. REC has already shown that LP50 is technically viable and does not undermine the

⁸ - See REC Networks comments at para. 26.

⁹ - See Amherst Alliance (“Amherst”) comments at 10, Common Frequency (“CF”) comments at 15, NLG comments at 6, Prometheus Radio Project (“Prometheus”) comments at 29 and Nexus Broadcast (“Nexus”) comments at 2. See also JCPES comments at 4 (supporting “retaining LP10 or other flexible ‘sub-watt’ service”).

¹⁰ - See Prometheus comments at 28-29.

¹¹ - *Id* at 29.

minimum distance spacing requirements in the LCRA. Therefore, we continue to feel that LP50 should be considered as a replacement for the LP10 service.

5. *LP50 should not be subject to LP10's "sub-secondary" status.* As mentioned in our comments, we do not feel that maximized LP50 stations should be subject to the same "sub-secondary" status rules that apply to LP10 stations¹². These rules include a lack of protection from displacement by LP100¹³ and FM translator stations¹⁴. Amherst also addresses this issue in their comments by stating that applying this type of displacement by superior facilities would not make sense "if the Commission is truly following the LCRA mandate to increase diversity and localism on the airwaves."¹⁵ With that, REC supports LP50 as a service class that is co-secondary with LP100, LP250 and FM translators. With LP50 stations allowed to operate a minimum of 1 watt, LP100 stations operating 51-100 watts and LP250 stations operating 101-250 watts, everyone's desired power levels are covered¹⁶

¹² - See REC comments at para. 32.

¹³ - See 47 C.F.R. §73.807(a)(1) noting a lack of requirement on the distance chart that LP100 must protect LP10 stations.

¹⁴ - See 47 C.F.R. §74.1204(a)(4) protecting LP100 stations but not LP10.

¹⁵ - See Amherst Comments at 7. They also state that if there should be displacement between facilities, it should be the "lower wattage" facilities being able to displace higher powered facilities. This is not a policy endorsed by REC. We do not feel there should be any displacement within the ranks of secondary services.

¹⁶ - A minimum operating power of 1 watt for LP50 stations is also supported by Amherst comments at 10 and Prometheus comments at 28.

B. LP250 SHOULD BE AVAILABLE TO NEW ENTRANTS AS WELL AS EXISTING LP100 STATIONS, IT SHOULD ALSO BE AVAILABLE IN METRO CORE AREAS ONLY IF SPECTRUM IS NOT NEEDED FOR LP50 OR LP100.

6. The concept of a 250-watt service has strong support within the LPFM community¹⁷. Within that support, Braulick and Mike Friend (“Friend”) support REC’s notion that LP250 should not be limited to existing stations and Friend further points out that the use of “build and operate” statements would be a regulatory departure¹⁸. We also do not feel that existing LP100 stations should be given a “bonus point” as suggested by Amherst¹⁹. Instead, we feel that existing LP100 stations who wish to upgrade to LP250 on the same, adjacent or IF channels and within 7.1 km of the current site should be permitted to do so on a minor change²⁰ and make this change prior to the LPFM filing window. REC also disagrees with Wesli Dymoke and Don Schellhardt’s proposal to allow stations to be licensed at LP250 but only be permitted to operate at 100-watts for a “two-year shakedown cruise”²¹. We do not find any administrative or technical logic in this proposal. We also find it subjective that the Commission be put in a position to judge whether an LPFM station is “worthy” of being allowed to upgrade to 250 watts. Operating at 250 watts vs. at 100 does not carry some new “golden power” that needs to be

¹⁷ - See Amherst comments at 12, Justin M. Braulick (“Braulick”) comments at 2, Brown Broadcasting (“Brown”) comments at 5, CRA comments at 7, Wet Mountain Broadcasting Corp. (“KWMV”) comments at 1, LPFMhelp comments at 2 (supports up to 500 watts), Monster-FM comments at 1, Nexus Broadcast (“Nexus”) comments at 2, NLG comments at 7, Prometheus comments at 30, Sibert comments at 4, Bill Turner (“Turner”) comments at 3, 3 Angels Broadcasting Messengers (“WQIN”) at 1 and Southwestern Ohio Public Radio (“WSWO”) at para 2.2.1.

¹⁸ - See Braulick comments at 2, Friend comments at 1, Prometheus comments at 33.

¹⁹ - See Amherst comments at 12.

²⁰ - See also Common Frequency comments at 18 and Prometheus comments at 33.

²¹ - See Comments of Wesli Dymoke and Don Schellhardt (“Dymoke”) comments at 2.

earned. REC supports LPFM applicants should be able to turn up at 250 watts from the start subject to certain urban area limitations we will discuss further in.

7. *LP250 in urban core areas.* In addition to REC, various other commenters²² agree that LP250 stations should be available in the urban core areas that were defined by the Commission²³. In addition, Common Frequency and Prometheus support an urban core licensing regime similar to that proposed by REC²⁴ where original construction permit short form applications within the urban core area (which REC only supports these restrictions for spectrum limited markets 1 through 50) should be required to file either for LP50 or LP100 facilities and then at the conclusion of the window, if the applicant is able to upgrade to LP250 and other LPFM applicants could also file for upgrades if they desire without creating new MX groups, then the applicant should be permitted to amend their application to specify LP250.

C. A “WESTERN” LPFM SOLUTION SIMILAR TO BROWN BROADCASTING’S LP250 PROPOSAL WARRANTS CONSIDERATION

8. In comments, Brown Broadcasting advanced a proposal that would allow up to 250 watts at 62 meters HAAT creating a 10.3 km service contour²⁵. In addition, other LPFM

²² - Brown comments at 5, Friend comments at 1, JCPES comments at 4, Sibert comments at 4, WSWO comments at para. 2.2.1. (WSWO is an LP100 station that would be precluded from upgrading due to the urban core zones).

²³ - Fifth FNPRM at para 51.

²⁴ - Common Frequency comments at 16 and 18, Prometheus comments at

²⁵ - Brown comments at 2. We note that Brown’s original comments stated 52 meters HAAT however 250 watts at 52m HAAT would create a service contour of 9.5 km. We believe this is was a typographical error as 250 watts at 62m HAAT would create a service contour of 10.3 km.

advocates proposed ideas for LPFM services with a service contour larger than 7.1 km²⁶. Sibert further reminds us that FM translators located west of the Mississippi River [and Zone 1-A] are permitted to operate at higher field strengths²⁷. The service that Brown is proposing is similar to a concept REC has called LP250-PLUS (“LP250+”). Under LP250+, LP250 stations in areas other than east of the Mississippi River or in Zone I-A²⁸ would be allowed to operate up to 250 watts at 107m HAAT creating a service contour of 13.3 km. This is similar to the maximum service area afforded to FM translators in this region. REC calls LP250 a “western solution” that can provide the mountainous areas of the west as well as Alaska with a wide area service across multiple rural communities as well as provide a viable LPFM option for applicants in communities located in areas with higher HAATs. If such a solution was offered for western LPFM stations, it would be offered in addition to the currently proposed LP250 service and we would support a hard limitation of restriction of LP250+ within a 50 km radius of the top-50 metropolitan market center points (both spectrum limited and spectrum available). Appendix A of this filing includes the spacing charts for REC’s LP250+ service concept.

D. CONSORTIA CREATES LICENSING ABUSE, DISCRIMINATION AND THE SILENCING OF OPPRESSED VOICES.

9. In *Comments*, it was made very apparent that many organizations shared REC’s viewpoint that encouraging and rewarding multiple organizations to come together to form a

²⁶ - LPFMhelp comments at 2 (supports 250 to 500 watt LPFM service), Nexus comments at 2 (supports 250 watts at 100m HAAT) and Sibert at 4 (LP250 stations could be authorized for any height or power combination up to the class maximum if it does not cause interference just as translator stations are allowed.)

²⁷ - Sibert comments at 4.

²⁸ - See 47 C.F.R. §73.205(b).

single consortium and the policy of point aggregation are not the answers for LPFM²⁹. Common Frequency shares REC's view that such arrangements will encourage discrimination³⁰, shuts out non-participating applicants and those who are competing against a consortium will likely lose out³¹ and the process is very prone to licensing abuses³². REC continues to feel that because of the specialized nature of LPFM, it needs a method that will allow for multiple diverse voices to use the channel and give as many people a chance to be heard. We feel that our two-party 12-hour and three-party 8-hour involuntary time share process would be the fairest way to administer this goal³³. REC has received concerns that the involuntary time share regime will create disputes between time share proponents resulting in feuding stations not adhering to their schedules and broadcasting in another station's time slot citing isolated incidents that have allegedly taken place in the past 10 years. The chances of this happening are unlikely but if it does happen, we have enforcement. The time share slot is a condition of the license and cannot be modified without Commission intervention.

²⁹ - Amherst comments at 13, Braulick comments at 4 (does not support consortiums receiving additional points as it is "still one station"), Brown Student Radio ("BSR") comments at 7,

³⁰ - Common Frequency comments at 23.

³¹ - Prometheus comments at 54.

³² - Sibert comments at 6.

³³ - See also Community Media Access Project ("CMAP") comments at 6.

E. EXTENDING THE LOCAL PRESENCE REQUIREMENT TO 20 MILES IN BOTH URBAN AND RURAL AREAS ASSURES A MORE ROBUST LPFM SERVICE, ESPECIALLY IN INNER-CITY AREAS.

10. There has been outstanding support by commenters to extend the local presence requirement to 20 miles for rural LPFM stations³⁴ as well as those who feel the 20 mile rule should also apply to urban LPFM stations³⁵. REC agrees that the 20 mile local presence requirement should also apply to urban stations. The geography of some communities and the mission of some organizations that would benefit from LPFM may require them located in the economically deprived inner-city areas while the organizations primary benefactors reside in other portions of the community and in some places such as Los Angeles and Phoenix, it may be necessary for a 20 mile or more radius to achieve a well-funded viable LP50 or LP100 station located in the inner-city.

11. *Local Presence and Native Nations.* At the same time, we also echo the concerns of Native Public Media that in some Native Nations, the tribal leadership is outside the 20 mile radius from the transmitter site³⁶. We feel that NPM's concerns can be remedied by an amendment to §73.853(b)(3) to allow an entity that is eligible for the Part 90 Public Safety Pool as a local government can have the LPFM station anywhere in their jurisdiction regardless of whether the LPFM station has an educational or public safety purpose. Tribal governments are normally eligible for Public Safety Pool local government frequencies under Part 90. In this

³⁴ - Amherst comments at 4, Monster comments at 2 and Nexus comments at 2.

³⁵ - Common Frequency comments at 22 and Prometheus comments at 51.

³⁶ - Native Public Media and National Congress of American Indians ("NPM") comments at 5.

situation, we feel that the requirement that the station be used for public safety (as opposed to educational) should be removed from §73.853(b)(3).

F. RESTRICTED TRANSLATOR AND BOOSTER OWNERSHIP BY LPFM STATIONS WILL HELP MAKE LPFM MORE VIABLE WITHOUT UNDERMINING LOCALISM

12. Overall, there has been significant support for LPFM stations to operate their own translators³⁷. NPR opposes LPFM stations operating translators stating that such operations will “undermine the local nature of LPFM”³⁸. WNKR and Common Frequency expressed concerns that “mini-networks” that are centered around the translator would be created³⁹. REC feels that these concerns can be addressed with the restrictions that were proposed by REC including requiring there to be overlap between the LPFM station’s service contour and the service contour of the translator, requiring the translator to simultaneously carry the LPFM primary station’s analog main channel at all times and requiring that the translator operate at equal or inferior field strength to the primary LPFM station. We believe that these processes for limited translator cross-ownership by LPFM are necessary to maintain the localism and purpose of the LPFM service while meeting unusual geographic situations that some LPFM stations may face.

13. *The use of FM Boosters by LPFM stations.* During the Reply Comment period, the Commission issued an *Order on Reconsideration* in the case of an LPFM station desiring to

³⁷ - Amherst comments at 15, Braulick comments at 4, Friend comments at 2, LPFMhelp comments at 1, Monster comments at 3, Nexus comments at 2 and Turner comments at 2.

³⁸ - National Public Radio (“NPR”) comments at 15.

³⁹ - Common Frequency comments at 20 and WNKR comments at 2.

operate an FM Booster. Unlike FM Translators, FM Boosters operate on the same channel and are limited to operations within the primary station's protected service contour in order to place service into an area that while in the station's protected contour, would not receive the station due to terrain or other factors. In the decision in *Great God Gospel and Educational Station, Inc.*, the Media Bureau interpreted §73.860(a) of the rules to place FM Boosters in a classification of "any other non-LPFM broadcast station."⁴⁰ Unlike FM Translators, FM Boosters do not allow stations to gain area outside of the service contour they are already entitled to. REC feels that especially with LP250 stations being proposed and perhaps a "western" solution such as Brown Broadcasting's 250 watts at 62m HAAT proposal or REC's LP250+ proposal, the use of boosters instead of translators to fill a gap in terrain coverage would be a more efficient use of spectrum and when engineered correctly should be encouraged. We therefore ask that if LPFM cross-ownership is extended to FM Translators that it is also extended to FM Boosters as well⁴¹.

G. OTHER ISSUES

14. *Timing of LPFM filing window.* The comments of Prometheus suggesting a delay from 6 to 9 months from final rules to the filing window⁴² have caused great concern by some in the LPFM community. REC feels that any "delays" between the issuance of the final rules and the window should be done as naturally as possible. The processing of the Auction 83 FM Translator applicants is very important in order to define the landscape that LPFM will be able to work with. In the LPFM/FM Translator Public Forum, a tentative timeline was established for

⁴⁰ - See *Stephen T. Yelverton*, Letter, 25 FCC Rcd 7300 (2010).

⁴¹ - See also Sibert comments at 5.

⁴² - See Prometheus comments at 13.

the processing of Auction 83 applications and it was stated that the LPFM window would likely take place in the spring or summer of 2013. REC believes that the Commission will have the *Sixth Report and Order* released and finalized by the end of 2012 and if so, the timing of the LPFM window in the spring or summer of 2013 based on the Commission's Media Bureau resources being used for Auction 83 and other projects not related to LPFM or FM Translators. We consider this a "natural" delay and we feel that such a time period from final rules to the LPFM filing window will already exist and at this time, there is no need to consider any "artificial" delays proposed by Prometheus.

15. *Structure of the LPFM Filing Window.* Both CMAP and Prometheus have shown support for a filing window structure that was proposed by REC in the *Third Notice of Proposed Rulemaking* suggesting that multiple filing windows be open and the boundaries for each filing window should be such that it does not create a disparity to a community in another state⁴³. For our proposed states and territories for each filing window, see Appendix B.

16. *LPFM Cross-ownership of full power stations.* REC opposes Catholic Radio Association's support of cross-ownership for not just Native Nations but for all organizations⁴⁴. REC feels that the specific needs of Native Nations justify the need for limited cross-ownership of LPFM facilities to be used for local educational and public safety programming while the

⁴³ - CMAP comments at 2 and Prometheus comments at 15.

⁴⁴ - Catholic Radio Association ("CRA") comments at 12.

cross-owned full power station is used as an external⁴⁵ educational resource or as a commercial tribal enterprise. We also feel the same way about LPFM stations that would be operated by students at schools, colleges and universities that already have a full power broadcast station that “shuts out” the students in favor of mainstream NPR or other formatted programming. While such cross-ownership is allowed under the rules, student LPFM stations are at a disadvantage during the application process as they are not permitted to compete for spectrum or enter into voluntary time share agreements. We ask the Commission to remove section §73.860(b)(4) to allow these stations an equal opportunity to be heard in the community⁴⁶.

17. *Second adjacent channel waivers.* There was support for LPFM stations using translator models such as *Living Way*⁴⁷ to show no interference⁴⁸ while others have different ideas⁴⁹ on allowing waivers in situations where there may be population in the overlap zone. REC feels the Commission does have the authority to define “interference” for the purposes of interpreting the LCRA. We still support a minimal overlap model in situations where there is a minute amount of potential listeners and that any interference remediation necessary is easily manageable by the LPFM licensee. REC’s sister organization Riverton Radio Project is a good example why such a limited waiver is necessary. The site is in a rural part of Maryland halfway

⁴⁵ - “External” in this case meaning that programming is intended for both tribal residents and the general public outside of tribal lands.

⁴⁶ - See also Common Frequency comments at 24.

⁴⁷ - See *Living Way Ministries*, 17 FCC Rcd 17054 (2002) at 11.

⁴⁸ - Common Frequency at 2, NLG comments at 7 and Prometheus comments at 17.

⁴⁹ - See Friend comments at 7 (suggesting using TV Channel 6 NCE protections such as those outlined in §73.525).

between two communities rural communities with populations of 364 and 649⁵⁰. A LP100 could reach both areas, LP250 even better. The only channels available require second adjacent channels. Because the overlap area is in a rural area and there are roads that go through the area, this would not qualify under Living Way. For one of the channels, LP250 would have a population of approximately 70 persons and 4 residential streets within the overlap zone. This population represents 0.07% (seven one hundredths of a percent) of the affected station's service contour. We feel that providing a new localized radio service has public interest priority and impacting such a small amount of listeners should not be considered interference under the statute. REC still supports the Commission's opinion in *Educational Information Corporation* that states that "Second [or third] adjacent overlap [...] is confined to a very small area around the transmitter of the interfering station. In addition, the potential for such interference to occur depends to a great extent on the quality of the receivers in the affected area"⁵¹.

18. *Existing LPFM stations on waivers.* With this, we continue remain worried about the welfare of existing LPFM stations on second adjacent channel waivers. We feel that the stations that were granted waivers under the old criteria would not be subject to the new regulations *ex post facto*. In Section 3(b)(2)(A) of the LCRA, it states that the Commission "may grant a waiver", thus written in the future tense. Because this was written in the future tense, we do not feel that it applies to LPFM stations already on waivers. However as we go forward, we feel that applying *Education Information Corporation* to all new displacement second adjacent channel waivers would serve the public interest and stay within the spirit of the LCRA.

⁵⁰ - In addition to a sparse rural area in between these communities with an overall 2010 population of 3,585 persons.

⁵¹ - See *Educational Information Corporation*, 6 FCC Rcd 2207 (1991) at 9.

H. CONCLUSION

19. The record shows overwhelming opposition in the elimination LP10 service. Some feel it should be given a chance but we feel that a 50-watt LPFM station would be more viable in the long run and still reach areas where LP100 can't. LP250 is also supported for new applicants as well as exiting stations. It should be limited in urban areas only until after lower powered LP50 and LP100 stations are given the first opportunity. We should look out of the box to address certain geographic issues that impact LPFM stations in the western United States. We stand with other organizations that oppose consortia, point aggregation and successive licensing. The FCC needs to change the local presence eligibility to 20-miles for rural and urban stations. The latter will assure viability of inner-city stations. Voices in the inner-city and rural areas will not be possible without a definition of interference that allows minimal population overlap. LPFM stations should be permitted translators and boosters. Finally, the timing for the filing window should come naturally based on Auction 83 processing and availability of Commission resources. There is no need for an artificial delay.

Respectfully submitted,



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APPENDIX A
SPACING CHARTS FOR REC'S LP250+ (LP250 PLUS)
CONCEPT "WESTERN" SOLUTION

REC Proposed LP250+

To domestic full-service, LPFM and Class D stations:

Station class protected by LP250+	Co-channel minimum separation (km)		First-adjacent channel minimum separation (km)		Second and third adjacent channel minimum separation (km)	I.F. channel minimum separations
	Required	For no interference received from max. class facility	Required	For no interference received from max. class facility		10.6 or 10.8 MHz
					Required	
LP50.....	50	50	25	25	None	None
LP100	51	51	26	26	None	None
LP250 (30m HAAT).....	53	53	27	27	None	None
LP250+ (102m HAAT).....	59	59	33	33	None	None
D	51	51	25	25	7	3
A	74	100	56	57	29	7
B1	98	127	74	83	46	9
B	127	151	96	112	67	12
C3	85	127	67	73	40	9
C2	98	151	80	91	53	12
C1	118	185	100	118	73	20
C0	129	200	111	137	85	24
C	137	211	120	150	93	28

Additional spacing for full-service stations in Puerto Rico and U.S. Virgin Islands:

Station class protected by LP250+	Co-channel minimum separation (km)		First-adjacent channel minimum separation (km)		Second and third adjacent channel minimum separation (km)—required	I.F. channel minimum separations—10.6 or 10.8 MHz
	Required	For no interference received from max. class facility	Required	For no interference received from max. class facility		
A	87	119	70	75	43	9
B1	106	135	82	91	54	11
B	153	187	123	151	93	19

REC Proposed LP250+

To FM Translator stations:

Distance to FM translator 60 dBu contour	Co-channel minimum separation (km)		First-adjacent channel minimum separation (km)		Second and third adjacent channel minimum separation (km)—required	I.F. channel minimum separations (km) 10.6 or 10.8 MHz
	Required	For no interference received	Required	For no interference received		
13.3 km or greater.....	66	75	40	43	21	5
Greater than 7.3 km, but less than 13.3 km	59	59	33	33	14	4
7.3 km or less	53	53	27	27	8	4

To Canadian stations:

Canadian station class	Co-channel (km)	First-adjacent channel (km)	Second-adjacent channel (km)	Third-adjacent channel (km)	Intermediate frequency (IF) channel (km)
A1 & Low Power	80	47	25	20	4
A	100	67	45	40	7
B1	112	79	57	52	9
B	127	93	71	67	12
C1	148	115	92	88	20
C	158	125	103	98	28

To Mexican stations:

Mexican station class	Co-channel (km)	First-adjacent channel (km)	Second- and third-adjacent channel (km)	Intermediate frequency (IF) channel (km)
Low Power	54	29	10	3
A	70	44	25	6
AA	98	69	46	7
B1	98	69	46	9
B	127	93	67	12
C1	118	92	73	20
C	137	112	93	28

REC Proposed LP250+

To TV channel 6 stations:

FM channel number	To full power channel 6 (km)	To low power/Class- A channel 6 (km)
201	149	107
202	146	105
203	143	101
204	141	99
205	139	98
206	137	95
207	135	93
208	135	93
209	135	93
210	135	93
211	135	93
212	135	93
213	134	93
214	134	92
215	134	92
216	133	91
217	133	91
218	132	90
219	131	90
220	131	89

APPENDIX B

STATES PROPOSED TO BE IN EACH LPFM FILING WINDOW

First Filing Window Area	Second Filing Window Area
Maine	Florida
Vermont	Georgia
New Hampshire	South Carolina
Massachusetts	North Carolina
Rhode Island	Tennessee
Connecticut	Mississippi
New York	Alabama
Pennsylvania	Arkansas
New Jersey	Louisiana
West Virginia	Oklahoma
Virginia	Texas
Maryland	New Mexico
Delaware	Arizona
District of Columbia	Colorado
Ohio	Utah
Kentucky	Wyoming
Michigan	Montana
Illinois	Idaho
Indiana	Washington
Missouri	Oregon
Iowa	Nevada
Minnesota	California
Wisconsin	Hawaii
Kansas	American Samoa
Nebraska	Guam
South Dakota	CNMI
North Dakota	Puerto Rico
Alaska	Virgin Islands